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Re: Lolo National Forest Plan Revision Comments

Submitted via CARA database

Dear Revision Team,

We are writing as concerned citizens who own an 80-acre inholding in LaValle Creek Watershed. Although LaValle Creek's headwaters are in Snowbowl Ski Area, the area is remarkably wild and ecologically intact. During the winter, there is concentrated use at ski area, but outside the resort boundaries and in the summer, there are only low levels of non-motorized recreation preserving the semi-primitive character of the area.

As a professional Ecologist and trained Wildlife Biologist, I have surveyed the flora and fauna of our property. Using remote cameras, I have captured several photos of grizzly bear (including cubs), wolves, and big game. A Forest Service employee pointed out a flammulated owl nest just above our road, and we often see pileated woodpeckers. Furthermore, we have sampled LaValle Creek with Montana Fish Wildlife and Parks and identified a genetically pure westslope cutthroat trout. Old growth is found on the roadless west side of LaValle Creek, and mature forests remain on the rest of our property and surrounding Forest Service Lands. There are few weeds – except for low densities of knapweed, mullein, and St. John's wort along the road and on disturbed areas.

Our comments focus on the Greater Missoula GA Maps 1) Desired Winter Recreation Opportunity Spectrum (GM-04), 2) Desired Summer Recreation Opportunity Spectrum (GM-05), and 3) Lands Suitable for Timber Production and Where Harvest Could Occur (GM-07). We support a semi-primitive nonmotorized setting for the area and oppose a motorized setting that would impact private land owners and commercial interests, disrupt quiet recreation, degrade wildlife habitat, and increase the risk of wildfire. Furthermore, we provide information on old growth stands that we do not believe should be considered for timber harvest because of ecological considerations and inaccessibility.

Desired Winter Recreation Opportunity Spectrum (GM-04)

We support the desired *winter* Recreation Opportunity Spectrum (ROD) of LaValle Creek watershed as a *semi-primitive nonmotorized* setting. The area has ungroomed trails, and only a historic cabin and a yurt are present. The area sees some Nordic and backcountry skiing use, but no motorized recreational use. Furthermore, the lower elevation portion of the area has winter habitat for mule deer and elk that are very sensitive to disturbance. We appreciate the Forest maintaining the non-motorized recreation status quo and its recognition of its importance to wildlife conservation and quiet recreation.

Desired *Summer* Recreation Opportunity Spectrum (GM-05)

The summer Recreation Opportunity Spectrum map of LaValle/Butler Creeks watershed shows a semi-primitive **motorized** setting (Figure 1). According to the Forest Plan Revision: “desired summer semi-primitive motorized settings provide motorized recreation opportunities in backcountry settings. Routes are designed for off-highway vehicles and high-clearance vehicles, including motorcycles.” However, there is currently no motorized recreational use in the area. **This setting does *not* align with current use in the area, would negatively impact landowners and commercial interests, greatly reduce the quality of non-motorized experiences, degrade fish and wildlife habitat quality, and increase the risk of wildfire.**

We oppose the desired *summer* Recreation Opportunity Spectrum (ROS) of a semi-primitive motorized setting for Butler Creek, and LaValle Creek areas (as mapped on GM-04, Figure 1). Specifically, Point Six/TV Mountain Road (FS 9962), LaValle Spur (FS 19080), and FS 19060 are all currently gated, closed to motorized use, and should not be allowed for motorized recreation.



Figure 1: Map GM-04: Greater Missoula Desired Summer Recreation Opportunity Spectrum. Zoomed into LaValle Creek Area. Green is Semi-Primitive Non-Motorized, Purple is Semi-Primitive Motorized, and red is Primitive ROS setting.

Butler Creek/Point Six roads are gated year-round and do not permit motorized recreation. These areas receive extensive non-motorized use from hikers, bikers, hunters, berry pickers, dog walkers, and birders among other non-motorized users. Additionally, several landowners would be negatively affected if motorized recreation was allowed in the area. Furthermore, this designation would negatively impact Snowbowl's summer operations (Brad Morris, personal communication), and the commercial operators of TV/radio towers will be concerned about vandalism to their infrastructure. Furthermore, an increased number of people in the area could increase the risk of starting a wildfire that would threaten private property and commercial infrastructure.

Butler Creek and LaValle Creek support genetically pure cutthroat trout populations. Sections of these roads chronically deliver sediment to the streams, and allowing motorized recreation would increase sediment production along the road and delivery to the streams. This in turn would degrade aquatic habitat including increased bank erosion, stream sedimentation, fewer pools, and reduced pool size negatively impacting these important conservation fish populations.

Grizzly bear, big game, and other wildlife use this area as well. Wildlife are sensitive to motorized recreation. Motorized recreation can impact wildlife through direct mortality, increased legal and illegal harvest, disturbance, and habitat loss. Several studies have found that large animals such as elk, wolves, and bears are negatively impacted by the loss of habitat security resulting from increased motorized access. Noise from motorized recreation can result in a range of impacts including increased stress, altered movement patterns, and avoidance of routes. Finally, motorized vehicles spread noxious weeds further degrading habitat.

Please consider making these areas as a semi-primitive nonmotorized setting to align with the current recreational use, respect landowners and commercial interests, and protect fish and wildlife habitat.

Lands Suitable for Timber Production and Where Harvest Could Occur (GM-07)

We recognize that the removal of timber is a multiple use provided by LNF and it is an important contributor to the economy of Montana. We support timber harvest on NFS lands to reduce fire risk, improve habitat, and speed old growth development.

The west side of LaValle Creek is mapped old growth, roadless, and very steep (Figure 2; Grant Creek Fuels Project), however, it is mapped as suitable for timber production in Map GM-07: Greater Missoula Lands Suitable for Timber Production and Where Harvest Could Occur (Figure 3). This area is very steep, un-roaded, and inaccessible, and has remained unlogged old growth because of economic and environmental constraints.

Please consider making west side of LaValle Creek as *not suitable for timber production or where harvest could occur.*

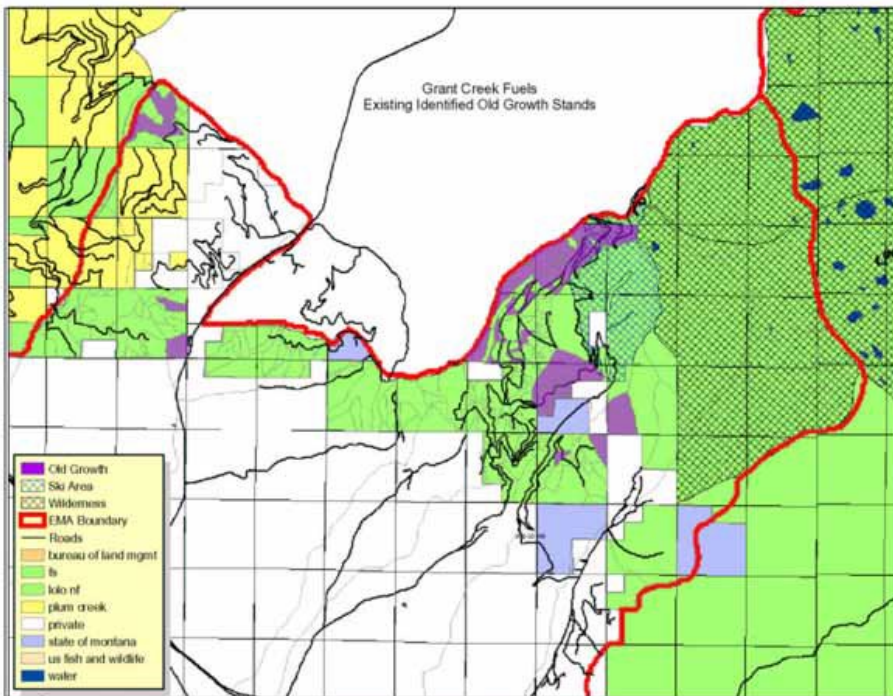


Figure 2: identified old growth stands from the Grant Creek Fuels Project. Old growth stands are in purple. The west side of LaValle Creek is primarily old growth.

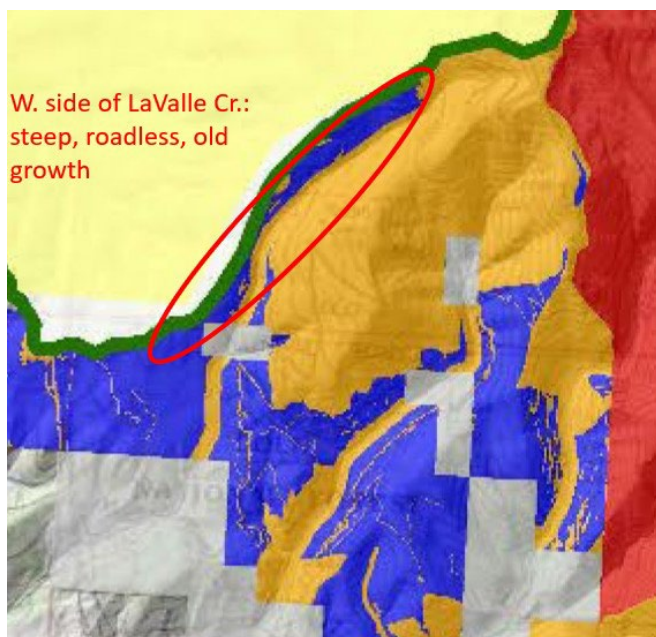


Figure 3: Map GM-07: Greater Missoula Lands Suitable for Timber Production and Where Harvest Could Occur. Zoomed into LaValle Creek Area. We do not believe the west side of LaValle Creek is suitable for the production or harvest of timber.